

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

BETH DONOVAN,)
Plaintiff)
v.) CIVIL ACTION NO. 20-11976-ADB
CITY OF BOSTON,)
Defendant)

)

JOINT STATEMENT OF THE PARTIES

Pursuant to the Court's Order of January 15, 2021 and in accordance with Federal Rules of Civil Procedure 16 (b) and Local Rule 16.1(D), counsel for Plaintiff Beth Donovan and counsels for Defendant City of Boston, have conferred and submit the following:

A. JOINT DISCOVERY PLAN

1. All Automatic Disclosures will be exchanged by parties by February 26, 2021;
2. Fact Discovery deadlines:
 - a. All written discovery, including requests for production of documents and interrogatories will be served by parties no later than June 1, 2021.
 - b. All requests for admissions must be served by June 1, 2021.
 - c. All depositions, other than expert depositions, will be completed no later than September 30, 2021.
3. Plaintiff's will disclose any experts by October 30, 2021;
4. Defendants' will disclose any experts by November 30, 2021; and
5. All expert discovery will be completed by December, 2021;

B. MOTIONS AND CONFERENCES

Parties submit a proposed schedule for motions:

- a. Dispositive motions, such as motions for summary judgement or partial summary judgment and motions for judgment on the pleadings, must be filed by January

30, 2022 with the opposition due thirty days thereafter. In the case of cross-motions the deadlines and page limits for the filings other than the Plaintiff's initial motion are set forth in the Session's Standing Order on Summary Judgement Motions unless specifically modified.

C. CERTIFICATIONS

The parties will make all necessary certifications, pursuant to Local Rule 16.1 (D)(3), under separate cover.

PLAINTIFF
BETH DONOVAN

DEFENDANT
CITY OF BOSTON

Eugene L. O'Flaherty
Corporation Counsel

By its attorneys

/s/ Dan V. Bair II

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on January 27, 2021.

/s/ Dan V. Bair II
Dan V. Bair II, Esquire